

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC TARIFF FILING OF BIG RIVERS | ) |            |
| ELECTRIC CORPORATION AND KENERGY       | ) | CASE NO.   |
| CORP. TO REVISE THE LARGE INDUSTRIAL   | ) | 2023-00312 |
| CUSTOMER STANDBY SERVICE TARIFF        | ) |            |

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.

Big Rivers Electric Corporation (BREC) and Kenergy Corp. (Kenergy) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 27, 2023. The Commission directs Joint Applicants to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Joint Applicants fail or refuse to furnish all or part of the requested information, Joint Applicants shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to BREC's response to Commission Staff's First Request for Information (Staff's First Request), Item 3. The March 3, 2023 Order in Case No. 2021-00289<sup>2</sup> made clear that Maintenance and Backup Services were different services and that BREC should provide cost support for the different services. Eliminating a service

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<sup>2</sup> Case No. 2021-00289, *Electronic Tariff Filing of Big Rivers Electric Corporation and Kenergy Corp. to Implement a New Standby Service Tariff* (Ky. PSC Mar. 3, 2023).

and effectively combining the two services is not responsive to the Order. Provide cost support for the different services in response to the previous Order.

2. Refer to BREC's response to Staff's First Request, Item 4, Attachment PSC 1-4.

a. Explain why Non-Member Sales do not include Nebraska.

b. Explain the MISO Adjusted CP to the BREC NCP w/o Losses column.

3. Refer to BREC's response to Staff's First Request, Item 4, Attachment PSC 1-4. Refer also to Case No. 2023-00310,<sup>3</sup> Appendix A, pages 49-51.

a. In Appendix A, page 51, non-coincident peak (NCP) is defined as inclusive of Non-Member Sales, whereas in Item 4, NCP does not include Non-Member sales. Explain and reconcile the difference.

b. Using the year 2023, explain and reconcile the seasonal breakdown with the annual figures in Appendix A. for Columns BREC NCP w/o Losses, Transmission Losses (MW) and Non-Member Sales. If Nebraska data is a primary difference between the two Non-Member Sales data sets, explain why it is being treated differently.

c. Refer also to Case No. 2023-00102,<sup>4</sup> BREC's August 18, 2023 response to Commission Staff's Third Request for Information, Item 6, page 2 of 2. Reconcile and explain the differences between BREC's MISO capacity positions in the two tables and any other discrepancies.

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<sup>3</sup> Case No. 2023-00319, *Electronic 2023 Integrated Resource Plan of Big Rivers Electric Corporation* (filed Sept. 29, 2023).

<sup>4</sup> Case No. 2023-00102, *Electronic Tariff Filing of Big Rivers Electric Corporation and Kenergy Corp. To Revise The Large Industrial Customer Standby Service Tariff*.

d. Between the three separate sets of data and corresponding analyses, explain which is the most up to date and which the Commission should rely upon.

4. Refer to BREC's response to Staff's First Request, Item 4, Attachment PSC 1–4 and Item 5. Explain whether the Unbridled Solar 160 MW PPA capacity is included in Attachment PSC 1–4.

5. Refer to BREC's response to Staff's First Request, Item 8c.

a. Explain how the MISO PRA PY22–23 could settle at \$236.66/MW-Day and the seasonal settlements can be significantly lower.

b. Under the new seasonal construct, explain whether there will still be a PRA planning year settlement price in addition to seasonal settlements and if so, what prices will be paid to committed resources.

6. Refer to BREC's response to Staff's First Request, Item 10.

a. Explain whether BREC is aware of either Domtar or Kimberley-Clark have registering as a Load Modifying Resource – Behind the Meter Generator (LMR-BTMG) resource or registering / committing their generation resources to participate in the annual PRA. Include in the response if either Domtar or Kimberley-Clark has indicated that they do not wish or intend to register their generation resources with MISO.

b. Explain whether MISO registered LMR-BTMG resources are subject to non-performance penalties in the same manner as BREC.

7. Refer to BREC's response to Staff's First Request, Item 11. Under the existing tariff, explain why BREC acknowledged and required a separation between services tailored to customers' scheduled and unscheduled outages, but now has

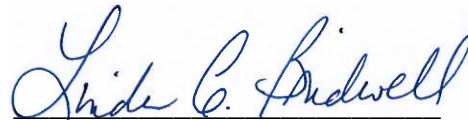
determined that is not reasonable. Include in the response when Maintenance Power Service and Backup Power Service or similar services named differently were first implemented.

8. Refer to BREC's response to Staff's First Request, Item 14.

a. If not answered above, confirm that MISO requires customers who self-supply a portion of their energy needs to have their self-supply capacity accredited.

b. If MISO does not require accreditation, explain why it is reasonable to require it now when it was not required previously.

9. Refer to BREC's response to Staff's First Request, Item 15. Explain whether BREC has evidence that its Standby customers were scheduling Maintenance outages so as to maximize the value of the Standby Customers Self Supply Capacity. Include in the response how the Standby Customer would schedule outages to maximize the value if its self-supply capacity.



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DATED NOV 07 2023

cc: Parties of Record

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